

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO**

IN THE MATTER OF:

RAMALLO BROS. PRINTING, INC.

Debtor

CASE NO. 14-01948 (EAG)

CHAPTER 11

**MOTION TO INFORM FILING OF OPPOSITION  
TO MOTION FOR ENTRY OF ORDER**

TO THE HONORABLE COURT:

COMES NOW Debtor through its undersigned counsel and very respectfully states and prays:

1. On March 14, 2013, Debtor filed its voluntary petition for reorganization under the provisions of Chapter 11 of the Bankruptcy Code, and as of that date has been operating its business and managing its affairs as debtor in possession, as provided for in the Bankruptcy Code. See Docket No. 1.

2. On March 20, 2014, LSREF2 Island Holding, Ltd., Inc. ("LSREF") filed a motion requesting entry of order prohibiting use of cash collateral and for adequate protection (the "Motion"). The Motion included a fourteen (14) day objection period. See Docket No. 11. As such the deadline to oppose the Motion is on or about April 3, 2014.

3. It must be underscored that the undersigned met with LSREF's attorney immediately upon filing the captioned case to discuss a possible settlement, and it was agreed that no motions would be filed before the settlement

negotiations concluded. Notwithstanding the above, a slight delay in submitting a settlement offer prompted the filing of the Motion by LSREF.

4. Regardless of the aforementioned, Debtor will engage in good faith negotiations with LSREF in order to try to reach an agreement. However, since the chances of reaching an agreement before the deadline to oppose the Motion are slim. As such, Debtor will file its opposition to the Motion and at least one adversary proceeding against LSREF before said deadline. It must be underscored, that settlement discussions should continue even after the filing of the adversary proceedings.

**WHEREFORE**, it is respectfully requested that this Court takes notice of the above.

**CERTIFICATE OF SERVICE:** I hereby certify that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF systems, which will send notification of such filing to the Office of the United States Trustee, and all participants of CM/EMF.

San Juan, Puerto Rico, this 28<sup>th</sup> day of March, 2014.

*s/ Alexis Fuentes-Hernández, Esq.*

**Alexis Fuentes-Hernández, Esq.**

USDC-PR 217201

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